

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

JAN 27 2020

David J. Bradley, Clerk of Court

RANDALL E. ROLLINS,

Plaintiff,

v.

GREENBERG TRAURIG, LLP, et al.,

Defendants.

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CIVIL ACTION NO. 4:19-cv-01514

**PLAINTIFF'S DISCLOSURE OF EXPERT WITNESSES
AND REQUEST FOR WAIVER OF EXPERT REPORTS**

Pursuant to the Court's Amended Rule 16 Scheduling Order (Dkt #68), Plaintiff hereby designates the following hostile expert witnesses who may be called at trial:

1. Professor Josh Blackman, South Texas College of Law, 713-646-1829
2. Professor Charles Rhodes, South Texas College of Law, 713-646-2918
3. Professor Emily Berman, University of Houston Law Center, 713-743-2507
4. Professor Seth Chandler, University of Houston Law Center, 713-743-2123
5. Professor Leslie Griffin, University of Houston Law Center, 713-743-9519
6. Professor Darnell Weeden, Thurgood Marshall School of Law, 713-313-4249

Plaintiff attempted to personally contact all the above witnesses who teach constitutional law, but only two of the above answered their calls; Professors Blackman and Weeden. These two professors both quickly declined to be a volunteer expert

witness for Plaintiff. The other four professors did not answer their phones. Therefore, Plaintiff must assume that they all must be treated as hostile witnesses and at least one must be subject to subpoena or summons at trial. In view of the fact that Plaintiff has been unable to obtain a voluntary expert witness, a voluntary expert report is unlikely; therefore, Plaintiff respectfully requests that in lieu of the filing of a written report, that the expert's testimony will be compelled and received at trial via a subpoena or summons.

(*Plaintiff also attempted to find an expert witness on constitutional law via both the Houston and Texas Lawyer Referral Services, but the “gatekeepers” would not refer me to an attorney because I am appearing en pro se.)

Respectfully submitted,

A handwritten signature in black ink, appearing to read "R. Rollins", written over a horizontal line.


Randall E. Rollins, en pro se
4415 Valparaiso Circle
Pasadena, Texas 77504
(713) 817-7088

CERTIFICATE OF SERVICE

I, the undersigned, do HEREBY CERTIFY THAT service of the foregoing instrument has been made on this 22nd day of January, 2020 by mailing a true copy thereof, in a sealed envelope, properly addressed with first class postage prepaid via United States Postal Service to each of the following:

Armando S. Chiu (*representing Def's Harris County, Ramsey and Goodwin)
1019 Congress, 15th floor
Houston, Texas 77002

Cynthia O. Akatugba (*representing Def's Texas and S.C.J.C.)
P.O. Box 12548
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By: 
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